

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

VIRGIL E. BROWN INSURANCE, et al.

Case No. 18-cv-00458-DAP

Plaintiff,

JUDGE: DAN A. POLSTER

v.

PROGRESSIVE BUSINESS FUNDING,
INC.,

Defendant

**PLAINTIFF VIRGIL E. BROWN
INSURANCE AND PLAINTIFF
MODERN HEARING SOLUTIONS OF
CANTON, INC.'s APPLICATION FOR
ENTRY OF DEFAULT JUDGMENT**

Plaintiffs Virgil E. Brown Insurance and Modern Hearing Solutions of Canton, Inc. hereby apply for an Entry of Default Judgment against Defendant Progressive Business Funding, Inc. by the Clerk of Courts. In support of the Application, Plaintiffs state the following:

1. Plaintiffs filed their Complaint against Defendant on February 27th, 2018 (Doc. No. 2)
2. Defendant was served via personal service of process on March 5th, 2018 (Doc. No. 5 at Page ID #34).
3. Defendant was required to response to the Complaint by March 26th, 2018.
4. Plaintiffs filed their Motion for Default Judgment on April 17th, 2018 (Doc. No. 7)

WHEREFORE Plaintiffs Virgil E. Brown Insurance and Modern Hearing Solutions of Canton, Inc. request the Clerk of Court issue an Entry of Default Judgment against Defendant Progressive Business Funding.

Respectfully Submitted,

/s/ Brian D. Flick, Esq.

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 19th, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brian D. Flick

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Marc E. Dann (0039425)

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Attorney for Plaintiffs